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MDE
MARYLAND DEPARTMENT OF THE ENVIRONMENT
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(410) 631-3000

Parris N. Glendening
Governor

Jane T. Nishida
Secretary

December 29, 1995

Mr. Jeff Kidwell
LANTDIV
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk VA 23511-2699

RE: Draft Site 1 Focused Feasibility Study, Allegany Ballistics Laboratory Superfund Site, October 1995

Dear Mr. Kidwell:

Enclosed are the Maryland Department of the Environment, Waste Management Administration's comments on the above referenced document.

If you have any questions, please feel free to contact me or Mr. Kim Lemaster at (410) 631-3440.

Sincerely,

Kim Lemaster for WTN

Wendy True Noe
Remedial Project Manager
Federal/NPL Superfund Division

WTN:bjm

Enclosure

cc: Mr. Tom Bass, WV DEP
Mr. Bruce Beach, EPA Region III
Mr. Dave McBride, Allegany Ballistics Laboratory
Mr. J. Greg Mott, CH2M Hill
Mr. Richard Collins
Mr. Robert DeMarco

MARYLAND DEPARTMENT OF THE ENVIRONMENT
WASTE MANAGEMENT ADMINISTRATION

Comments:
Draft Site 1 Focused Feasibility Study, Allegany Ballistics Laboratory Superfund Site,
October 1995

GENERAL COMMENTS

1. Sections of this document which discuss the use of mixing zones are still under review. Comments on this topic will be sent under separate cover.

2. Cleanup of the debris along the bank of the Potomac River at Site 1 should be considered as a component in Alternatives 3 through 7.

3. The MDE expects that all water pumped from Site 1 will undergo treatment before discharge to the North Branch Potomac River.

4. MDE recommends that groundwater containment be considered during selection of a remedial alternative for Site 1. This should be included in order to prevent off-site contaminant migration to sediment and surface water. An evaluation of remedial alternatives for contaminated surface water and sediment may be required if control of the source(s) of contaminants is not considered in the final remedial action at Site 1.

5. Was the possibility of off-site disposal of metals-contaminated soil, as opposed to stabilization, examined for Alternative 6? This would eliminate the need for on-site waste management.

SPECIFIC COMMENTS

1. Page ES-2, third paragraph
   Please clarify the reference to "depauperate population" in the fourth sentence.

2. Page 1-35, first full paragraph
   See specific comment #1.

3. Page 3-20, *Cost*
   Please provide cost estimates for the following: 1) 20 extraction wells, and 2) operations and maintenance (O&M).

4. Page 3-20, Alternative GC-4, *Effectiveness*
   Should "Alternative GC-4" on the last line of this page be changed to "Alternative GC-3?" Please clarify.

5. Page 3-24, *Effectiveness*, third paragraph
Some of the volatile organic compounds (VOCs) contained in the groundwater under Site 1 are listed hazardous wastes. Water contaminated with listed hazardous wastes cannot be directly discharged to the Potomac River without first undergoing treatment. Please modify this section to indicate that all groundwater extracted from Site 1 will undergo treatment to reduce or eliminate contaminant concentrations.

6. Page 3-28, last paragraph, first sentence
Should the reference to "column four" actually be to column five? Please clarify.

7. Page 3-28, last paragraph
While some of the concentrations shown in Tables 3-7 and 3-8 may be below MCLs at the edge of the mixing zone, dilution is not a treatment. Please see general comment #3 and specific comment #5.

8. Page 3-42, *Screening Level 1*
Please review the references to figures in this section and make changes, as appropriate.

9. Table 3-10
Why isn't chloromethane included on this table? It appears on Table 2-3 as a contaminant of potential concern (COPC). Please clarify.

10. Page 3-44, *Screening Level 3*
Screening Level 3A is more stringent than 3B. Why is there a greater volume of soil to treat under Screening Level 3B than 3A? Please clarify.

11. Tables 3-11, 3-13, and 3-15
Please check the noncancer value calculated for 1,3,5-Trinitrobenzene.

12. Page 4-26, first complete paragraph
Please see general comment #3 and specific comment #5.

13. Page 4-49, first sentence
During design of a groundwater treatment system, please consider the overall water usage in the vicinity of Allegany Ballistics Laboratory, including nearby areas in Maryland.